

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

ZJBV Properties, LLC,

*Plaintiff,*

V.

Mammoth Tech, Inc.,

*Defendant.*

Civil No. 1:21-cv-01070-JL

## **PLAINTIFF'S STATEMENT REGARDING MEDIATION**

NOW COMES the Plaintiff, ZJBV Properties, LLC (“ZJBV”), by and through counsel, Bernstein, Shur, Sawyer & Nelson, P.A., and hereby submits a statement regarding the status of mediation as follows:

1. On or around April 5, 2022, ZJBV propounded its First Set of Interrogatories and First Request for Production of Documents on the Defendant, Mammoth Tech, Inc. (“Mammoth Tech”).
2. On or around May 18, 2022, Mammoth Tech’s counsel filed an Assented-to Motion to Withdraw, which was granted on May 24, 2022. [Dock. No. 15.]
3. On or around June 3, 2022, ZJBV filed a Motion for Default against Mammoth Tech for its failure to answer the written discovery requests. [Dock. No. 17.]
4. On or around June 28, 2022, the Court entered an Endorsed Order, in which it set July 12, 2022 as the deadline for Mammoth Tech to file an Objection to the Motion for Default.

5. On or around July 11, 2022, Mammoth Tech's former counsel entered an Appearance in the above-captioned matter and filed an Objection to the Motion for Default. [Dock. Nos. 18, 19.]

6. On or around July 12, 2022, the Court granted Mammoth Tech's Objection to the Motion for Default and set Mammoth Tech's deadline to file a response to ZJBV's First Set of Interrogatories as August 2, 2022.

7. At this time, ZJBV awaits interrogatory responses from Mammoth Tech.

8. As a result, it is ZJBV's position that mediation would be premature. However, ZJBV does not object to participating in a mediation after the Parties pursue additional discovery.

Respectfully submitted,  
ZJBV Properties LLC

By and through its counsel,  
Bernstein, Shur, Sawyer & Nelson, P.A.

Dated: July 28, 2022

/s/ Hilary Holmes Rheume, Esq.  
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### **CERTIFICATE OF SERVICE**

I certify that on this 28<sup>th</sup> day of July, 2022, I provided a true and exact copy of the foregoing to all counsel of record.

/s/ Hilary Holmes Rheume, Esq.  
Hilary Holmes Rheume, Esq.